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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

SEP 4 - 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Implementation of the Local Competition
Provisions in the Telecommunications Act
of 1996

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CC Docket No. 96-98

DOCKET FILE COPY ORIGINAL

**OPPOSITION OF BTI AND FIBERSOUTH
TO JOINT MOTION OF GTE CORPORATION AND THE
SOUTHERN NEW ENGLAND TELEPHONE COMPANY
FOR STAY PENDING JUDICIAL REVIEW**

These comments are filed by BTI and FiberSouth, in opposition to the Joint Motion of GTE Corporation and The Southern New England Telephone Company for a Stay Pending Judicial Review of the Commission's Final Rules released August 8, 1996, implementing the local competition provisions of the Telecommunications Act of 1996. BTI is a telecommunications company certified to provide local exchange service in North Carolina and Georgia. FiberSouth is a telecommunications company certified to provide local exchange service in North Carolina.

Attached to the Joint Motion were two letters from BTI and one from Fiber South to GTE and GTE Florida, dated July 10, 1996, asking to suspend interconnection negotiations pending the Commission's final order in this proceeding. The letters, which were sent in a business negotiation, have been taken out of context and do not support the purpose for which the Joint

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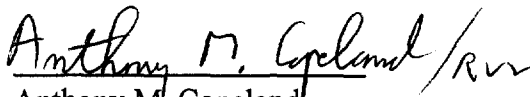
Motion attempts to use them. At the time the letters were sent, BTI and FiberSouth did not know what the contents of the Final Rules would be. The letters were not intended to indicate a position on what the Commission's final order should provide, but were sent in recognition of the potential impact of the Commission's order, whatever it might be. Under the Congressional deadline, the order was due to be issued less than a month after the letters were sent. In that context, suspension of negotiations was certainly reasonable and carried no implication as to the appropriateness or legality of the Rules as finally issued.

The letters were only part of a business negotiation, and BTI and FiberSouth had reasons to suspend in addition to the imminent issuance of the Final Rules. In fact, one of the obstacles to the negotiation was the lack of progress at the State commission level. In addition, BTI and FiberSouth were concerned about terms and conditions of interconnection going well beyond the pricing terms that are the focus of the Joint Motion's challenge to the Rules. The reasonable belief of BTI and FiberSouth that the imminently-pending issuance of Rules might have an impact on several facets of interconnection negotiations was a prudent recognition of business reality and has no relevance to the legal or policy issues argued in the Joint Motion.

BTI and FiberSouth believe that the Rules are within the Commission's authority under the Telecommunications Act of 1996, for the reasons explained in the Commission's Order, and that the Rules provide a sound framework for effective local exchange competition as intended by Congress. Issuance of a stay pending appeal would delay the entry of companies such as FiberSouth and BTI into the local exchange market, and inflict losses on these companies that

would be unrecoverable. We strongly support the Commission's action. The Stay should be denied.

Respectfully submitted,

A handwritten signature in cursive script, reading "Anthony M. Copeland /rvr".

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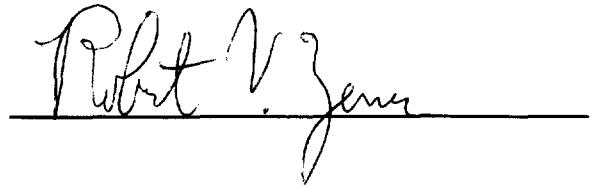
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing OPPOSITION TO JOINT MOTION OF GTE CORPORATION AND THE SOUTHERN NEW ENGLAND TELEPHONE COMPANY FOR STAY PENDING JUDICIAL REVIEW have been served by Hand Delivery (**) or by First Class Mail, postage prepaid, this 4th day of September, 1996, to each on the attached list.



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